IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF GEORGIA WAYCROSS DIVISION

| ele castrict court |
|--------------------------|
| Strenkern District of Ga |
| Filed in Office |
| 5:30 |
| 788 27 M.S. |
| The Maria |
| Eq. (1) Sept. (1) |

| | | >71 MASCEL |
|---|---|--|
| JULIE RHODES LATHAM, INDIVIDUALLY, |) | Experience of the second secon |
| AND AS ADMINISTRATRIX OF THE ESTATE |) | |
| OF RUFUS ROBERT RHODES, DECEASED, |) | |
| |) | |
| Plaintiff, |) | |
| , |) | |
| VS. | Ć | Civil Action No. CV504-098 |
| |) | |
| WARE COUNTY, GEORGIA, RONNIE |) | |
| MCQUAIG, IN HIS OFFICIAL CAPACITY AS |) | |
| SHERIFF OF WARE COUNTY, GEORGIA, |) | |
| WARE COUNTY EMERGENCY MEDICAL |) | |
| SERVICES, MARK WALKER, IN HIS OFFICIAL | j | |
| CAPACITY AS DIRECTOR OF WARE COUNTY | ì | |
| | , | |
| EMERGENCY MEDICAL SERVICES, AEDEC | , | |
| INTERNATIONAL, INC., PETER WROBEL, M.D. |) | |
| AND BLACKSHEAR FAMILY PRACTICE, P.C. |) | |
| |) | |
| Defendants. | í | |

CONSENT ORDER OF CONFIDENTIALITY

The parties having agreed to a compromised resolution of this matter, and the signatories hereto having agreed to the confidentiality of the fact and terms under which they have resolved in this matter, and it appearing that there is just cause for the confidentiality and terms agreed upon and that the interests of justice would be served by the entry of this Consent Order, it is hereby ordered as follows:

- A. The signatories shall keep the fact and terms of the resolution of this matter confidential and the fact and/or terms of the resolution shall not be divulged except as set forth below:
 - 1. As may be required by law or applicable rules or regulations of any court or governmental body or agency with competent authority, including, without limitation, an audit or other administrative procedure of the Internal Revenue

Service;

- 2. To the tax return preparer, auditor or other professional of any of the parties hereto solely for the purposes of preparing tax returns and audits of the parties;
- 3. In the event the disclosure contemplated in Paragraphs 1 and/or 2 is necessary, the persons or persons to whom the information is disclosed shall be notified of the terms of this Consent Order and shall be bound thereby, and by receiving the information shall be deemed to agree to and be bound by the enforcement provisions of this Order;
- 4. In the event any signatory hereto contends they are in any manner, including those contemplated in Paragraphs 1 and/or 2 above, legally obligated to disclose any information sought to be kept confidential hereby to any person or entity, they shall notify counsel for the other signatory <u>prior</u> to any such disclosure, pursuant to the terms of any associated settlement agreement to which they may be bound; and
- 5. There will be no reference made of this matter in any way in any advertising materials, including yellow pages and internet publications.
- B. Access to the record of this case shall be available only upon further Order of this Court following the filing of a Motion therefor and service upon all signatories and their undersigned counsel providing notice and thirty (30) days within which to object or consent to the same.
- C. By signing below, Julie Rhodes Latham, in all of her capacities, hereby certifies and warrants to the Court that the she has disclosed the terms and conditions of this settlement

to no one outside of his counsel whose signatures are below, and her family members.

D. All signatories to this Consent Order, by signing below, hereby stipulate to the jurisdiction of the Superior Court of Chatham County for the adjudication of any alleged breach of this Consent Order. The parties further stipulate that the Superior Court shall have all remedies available to utilize for any breach of this Order, including full contempt powers and injunctive relief and/or the terms of any associated settlement agreement to which they may be bound.

| SO ORDERED this | day of | , 2005. |
|-----------------|--------|---------|
| | | |

William T. Moore, Judge U.S.D.C., Southern District of Georgia

CONSENTED TO:

Julie Rhodes Latham, Individually and as administratrix of the Estate of Rufus Robert

ulie Rhodes Lathr

Rhodes, Deceased

PLAINTIFF

Brent/I. Savage, Esq.

SAVAGE, TURNER, PINSON &

KARSMAN

Attorneys for Plaintiffs

Wiley A. Wasden, III

BRENNAN & WASDEN, LLP

Attorneys for Defendants

411 East Liberty Street

Savannah, Georgia 31401

(912)232-6700